

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jermaine Julius Smith,

Debtor

Rushmore Loan Management Services, LLC as  
servicer for U.S. Bank National Association, not  
in its individual capacity but solely as trustee for  
RMTP Trust, Series 2021 Cottage-TT-V

Movant

Jermaine Julius Smith  
KENNETH E. WEST, Trustee,  
Respondents

Case No.: 20-10369-elf

Chapter: 13

Judge Eric L. Frank

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP  
Attorneys for Rushmore Loan Management Services,  
LLC as servicer for U.S. Bank National Association, not  
in its individual capacity but solely as trustee for RMTP  
Trust, Series 2021 Cottage-TT-V  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
bankruptcy@FriedmanVartolo.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver

of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: September 19<sup>th</sup>, 2022

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esquire  
FRIEDMAN VARTOLO LLP  
Attorneys for Movant  
1325 Franklin Avenue, Suite 160  
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Bankruptcy@FriedmanVartolo.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: :  
Jermaine Julius Smith, : Bankruptcy Case No. 20-10369-elf  
Debtor : Chapter 13  
 : Judge: Eric L. Frank  
Rushmore Loan Management Services, LLC :  
as servicer for U.S. Bank National :  
Association, not in its individual capacity but :  
solely as trustee for RMTP Trust, Series 2021 :  
Cottage-TT-V :  
Movant :  
Jermaine Julius Smith :  
KENNETH E. WEST :  
Respondents :

**CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on September 19<sup>th</sup>, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: September 19<sup>th</sup>, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esquire  
FRIEDMAN VARTOLO LLP  
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Bankruptcy@FriedmanVartolo.com

**Service by NEF**

**Trustee**

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**Debtor's Counsel**

ALBERT J. SCARAFONE, JR.  
Hill, Friedland & Scarafone  
1717 Swede Road  
Suite 200  
Blue Bell, PA 19422-3372

**U.S. Trustee**

United States Trustee  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
Suite 300  
Philadelphia, PA 19107

**Service by First-Class Mail**

**Debtor**

Jermaine Julius Smith  
1010 Ivy Lane  
Pottstown, PA 19464-2906